

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.)	
<i>individually and on behalf of all</i>)	
<i>others similarly situated,</i>)	
)	
Plaintiffs,)	
)	Civil Action No. 3:12cv700
v.)	
)	
LAW OFFICES OF SHAPIRO, BROWN, &)	
ALT, LLP, et al.,)	
)	
Defendants.)	

**PLAINTIFFS’ MEMORANDUM IN SUPPORT OF THEIR SECOND MOTION FOR
ENLARGEMENT OF TIME TO SUBMIT THEIR RESPONSE IN OPPOSITION TO
DEFENDANTS’ MOTION TO TRANSFER VENUE AND CONSOLIDATE**

COME NOW the Plaintiffs, by counsel, and in support of their Second Motion for Enlargement of Time to Submit Their Response in Opposition to Defendants’ Motion to Transfer Venue and Consolidate, they state as follows:

Defendants, the Law Offices of Shapiro, Brown & Alt, LLP (“Shapiro”) and Professional Foreclosure Corporation of America (“PFC”), filed a Motion to Transfer Venue and Consolidate this case with *Moore, et al. v. Shapiro & Burson, LLP*, Civil Action No. 4:11-cv-122, currently pending in the Norfolk Division of the Eastern District of Virginia on December 24, 2012. The Court entered a Consent Order extending the Plaintiffs’ time to respond to the motion until January 21, 2013 and the Defendants’ time to file a reply until January 31, 2013. Because Plaintiffs’ deadline fell on a holiday, Plaintiffs response brief is due today, January 22, 2013.

Plaintiffs’ counsel has been working diligently to comply with this deadline. However, despite several attorneys dedicated to the task of drafting Plaintiffs’ response brief, Plaintiffs nonetheless require an additional week to fully respond to the Defendants’ Motion, which would

require the filing of their opposition brief on or before January 29, 2013. Plaintiffs agree to extend the same amount of time for the Defendants' reply brief, which would be due on or before February 7, 2013.

The Defendants have indicated that they do not oppose this motion. Furthermore, the Defendants will suffer no legal prejudice as a result of an extension and the interests of justice will be served by granting this motion.

For good cause shown, Plaintiffs respectfully request that this Court grant their Second Motion for Enlargement of Time and enter the Proposed Order.

Respectfully submitted,
PLAINTIFFS,
*individually and on behalf of all
others similarly situated*

By: _____/s/
Of Counsel

Matthew J. Erausquin, VSB No. 65434
Janelle E. Mason, VSB No. 82389
Casey S. Nash, VSB No. 84261
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: (703) 273-7700
Fax: (888) 892-3512
matt@clalegal.com
janelle@clalegal.com
casey@clalegal.com

Kristi C. Kelly, Esq., VSB #72791
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Drive, Suite 200
Fairfax, VA 22030
Telephone 703.251.5400
Facsimile 703.591.9285
kkelly@sipfirm.com

Leonard A. Bennett, VSB#37523
Susan M. Rotkis, VSB#40693
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, VA 23601
Telephone (757) 930-3660
Facsimile (757) 930-3662 Facsimile
lenbennett@clalegal.com
srotkis@clalegal.com

Dale Wood Pittman, VSB #15673
THE LAW OFFICE OF DALE W. PITTMAN, P.C.
112-A W Tabb Street
Petersburg, VA 23803-3212
Telephone (804) 861-6000
Facsimile (804) 861-3368
dale@pittmanlawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John C. Lynch (VSB No. 39267)
TROUTMAN SANDERS LLP
222 Central Park Avenue, Suite 2000
Virginia Beach, Virginia 23462
Telephone: (757) 687-7765
Facsimile: (757) 687-1504
john.lynch@troutmansanders.com
megan.burns@troutmansanders.com
ethan.ostroff@troutmansanders.com
maryia.jones@troutmansanders.com

Counsel for the Defendants

_____/s/
Casey S. Nash, VSB No. 84261
Consumer Litigation Associates, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: (703) 273-7700
Fax: (888) 892-3512
casey@clalegal.com